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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ESTEFANIA CORREA RESTREPO,  
Plaintiff,

v.

AMAZON.COM SERVICES LLC;  
DOES I-X,  
Defendant.

Case No.: 2:25-cv-00119-RFB-DJA

STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND ALL  
DEADLINES

(SECOND REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Estefania Correa Restrepo, by and through her counsel of record, Kemp & Kemp and Leon Greenberg Professional Corporation, and Defendant Amazon.com Services LLC., by and through its counsel of record, Littler Mendelson P.C., as follows:

1           1.     This matter was filed in state court on December 2, 2024, and Defendant  
2 was served on December 18, 2024, with a copy of the Complaint and a Summons  
3 issued by the state court.

4           2.     On January 17, 2025, Defendant removed the action to federal court  
5 based on diversity jurisdiction. ECF No. 1.

6           3.     On February 28, 2025, the Court entered an Order granting the  
7 Stipulated Discovery Plan and Scheduling Order submitted by the parties. ECF No.  
8 10.

9           4.     On July 2, 2025, the Court entered an Order extending discovery  
10 deadlines. ECF 17.

11           5.     This is the second request by the parties to extend the discovery  
12 deadlines set forth in the February 28, 2025, Order. ECF No. 10.

13           6.     The Parties participated in an ENE on July 1, 2025.

14           7.     The parties were unable to reach a resolution at the ENE and identified  
15 that further discovery would have to be conducted.

16           8.     Since the ENE, Plaintiff has disclosed additional documents in support  
17 of her claims, and has responded to written discovery requests.

18           9.     The parties are working on resolving issues relating to disclosure of  
19 confidential documents and written discovery disputes.

20           10.    The parties continue to cooperate on planning for additional written  
21 discovery, and potential depositions.

22           11.    In light of the significant discovery activities remaining, the parties  
23 believe these circumstances warrant good cause for extra time to complete discovery.

24           11.    The parties stipulate and agree to extend the deadline for the close of  
25 discovery for ninety (90) days to allow the parties to complete written discovery and  
26 conduct necessary depositions in order to fully evaluate the claims and defenses  
27 presented.  
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1                   **A. STATEMENT OF DISCOVERY THAT HAS BEEN COMPLETED**

2           The parties have completed the exchange of both initial and supplemental  
3 disclosures in accordance with the applicable procedural rules. In addition to these  
4 disclosures, each party has served written discovery requests in the form of  
5 interrogatories and requests for production. The parties have further responded to  
6 both sets of requests and interrogatories, as well as reviewed each other's responses  
7 and are engaging in the meet and confer process to discuss any perceived deficiencies  
8 therein. The parties anticipate serving third-party subpoenas as well, but at this time,  
9 must resolve disputes over requested releases before subpoenas can be issued.

10                   **B. STATEMENT OF DISCOVERY THAT REMAINS TO BE**  
11                   **COMPLETED**

12           Plaintiff will seek depositions of Defendant through Rule 30(b)(6) witness(es)  
13 and will seek depositions of other individuals with knowledge of the facts at issue.

14           Defendant intends to seek the deposition of Plaintiff, as well as the depositions  
15 of relevant third-party witnesses who may possess information pertinent to the claims  
16 and defenses in this matter. Following the completion of these depositions, Defendant  
17 anticipates that additional discovery will be necessary to address issues raised during  
18 the testimony and to further develop the factual record. Defendant intends to subpoena  
19 third parties who maintain documents on behalf of Plaintiff, including her providers,  
20 once appropriate releases have been agreed upon and executed.

21                   **C. REASONS FOR REQUESTED EXTENSION**

22           The parties have been diligently working to resolve outstanding discovery  
23 disputes, including issues related to the implementation of the protective order. The  
24 negotiation of the protective order has impacted the timing of disclosures involving  
25 confidential documents. The parties are also continuing to follow up on previously  
26 served discovery requests. To that end, Defendants have served a meet and confer  
27 letter and scheduled a meet and confer conference with Plaintiff pending receipt of  
28

1 supplemental discovery, and anticipating that Plaintiff will decline to supplement at  
2 least some of the records she has already declined to produce. The parties anticipate  
3 resolving a majority of these disputes through the meet and confer process and will  
4 require additional time to engage in motion practice as necessary. Moreover, releases  
5 necessary for the issuance of third-party subpoenas are a part of the meet and confer  
6 process and as such, the additional time is required to allow third parties the time to  
7 respond to the subpoenas once the releases have been agreed upon and signed.  
8 Additionally, the parties expect to serve further discovery following the completion of  
9 depositions.

#### 10 11 **D. PROPOSED SCHEDULE**

12 The parties stipulate and agree that:

13 1. **Discovery:** The discovery period shall be extended ninety (90) days from  
14 October 21, 2025, to **January 19, 2026**.

15 2. **Dispositive Motions:** The parties shall have through and including  
16 **February 18, 2026**, to file dispositive motions, which is 30 days after the discovery  
17 deadline.

18 3. **Pre-Trial Order:** If no dispositive motions are filed, the Joint Pretrial  
19 Order shall be filed thirty (30) days after the date set for the filing of dispositive  
20 motions. In the event dispositive motions are filed, the date for filing the Joint Pretrial  
21 Order shall be suspended until thirty (30) days after decision on the dispositive  
22 motions or by further order of the Court.  
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